

Exhibit 6

1 - EVREN ERYUREK -

2
3 IN THE UNITED STATES DISTRICT COURT
4 FOR THE SOUTHERN DISTRICT OF NEW YORK
----- X
5 ULKU ROWE,

6 Plaintiff,

7 Case No.
8 19 Civ. 08655(LGS)(GWG)

9 v.

10 GOOGLE LLC

11 Defendant.
----- X

12 DATE: December 3, 2020
13 TIME: 11:37 a.m.

14 VIDEOTAPED VIDEOCONFERENCE DEPOSITION
15 OF EVREN ERYUREK, held via Zoom, pursuant to
16 Notice, before Hope Menaker, a Shorthand Reporter
17 and Notary Public of the State of New York.
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- EVREN ERYUREK -

A P P E A R A N C E S

OUTTEN & GOLDEN LLP

Attorneys for Plaintiff

685 Third Avenue

New York, New York 10017

BY: CARA E. GREENE, ESQ. (Via Zoom)
SHIRA Z. GELFAND, ESQ. (Via Zoom)
MAYA JUMPER, ESQ. (Via Zoom)
ceg@outtengolden.com
sgelfand@outtengolden.com

PAUL HASTINGS LLP

Attorneys for Defendant

200 Park Avenue

MetLife Building

New York, New York 10166

BY: KENNETH W. GAGE, ESQ. (Via Zoom)
SARA B. TOMEZSKO, ESQ. (Via Zoom)
Kennethgage@paulhastings.com
Saratomezsko@paulhastings.com

ALSO PRESENT: (Via Zoom)

PETER COOPER, ESQ.

JOSE RIVERA - Videographer

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2 IT IS HEREBY STIPULATED AND AGREED by
3 and among the attorneys for the respective parties
4 hereto, that the sealing and filing of the within
5 deposition be waived.

6
7 IT IS FURTHER STIPULATED AND AGREED
8 that all objections, except as to the form, are
9 reserved to the time of trial.

10
11 IT IS FURTHER STIPULATED AND AGREED
12 that the within examination and any corrections
13 thereto may be signed before any Notary Public
14 with the same force and effect as if signed and
15 sworn to before this Court.

1 - ROUGH DRAFT - EVREN ERYUREK

2 roles?

3 MR. GAGE: Objection.

4 A. Global client leads versus global

5 client technical leads was definitely an ambiguity

6 at best.

7 Q. And what about with respect to

8 technical solutions?

9 MR. GAGE: Objection.

10 A. So that was something I was familiar
11 with it because we were trying to figure out how
12 -- kind of this last mile, if you will, working
13 with the customers and so forth. Again there was,
14 you know, enough of an overlap between those
15 three.

16 Q. Okay. You can put that document
17 aside.

18 How long did you actually function
19 under Mr. Shaukat or in his organization?

20 MR. GAGE: Objection.

21 A. Don't know exactly, but weeks.

22 Q. I want you to look now at Exhibit --
23 or Tab 122 --

24 A. Yup.

25 Q. -- which I think has been marked as

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2 Q. Was your technology-based experience
3 relevant to the PM role?

4 MR. GAGE: Objection.

5 A. Yes.

6 Q. Was your experience at designing,
7 scoping, and delivering complex applications and
8 services relevant?

9 MR. GAGE: Objection.

10 A. Yes, but I have PMs who are much more
11 hands-on than I am.

12 Q. Do you mean you have PMs reporting to
13 you?

14 A. Yes.

15 Q. So at your level, it's less of a
16 hands-on role; is that right?

17 A. Correct.

18 Q. Is experience with multiple software
19 design methodologies relevant to the PM role?

20 MR. GAGE: Objection.

21 A. That would be more -- on the how part
22 of it that would be more engineering, but I like
23 it because I was a champion in like how to
24 develop/drive agile software and so forth -- agile
25 software development.

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2 Q. Was an understanding of the
3 challenges modern enterprises face with respect to
4 scale, speed, and user expectations relevant to
5 the -- the PM role?

6 MR. GAGE: Objection.

7 A. Yes.

8 Q. Does the PM role require that you get
9 hands-on with customer projects?

10 MR. GAGE: Objection.

11 A. You're with customers all the time.

12 Q. Did the PM role involve designing and
13 solving AI problems?

14 MR. GAGE: Objection.

15 A. I'm not in the AI team.

16 Q. Does it involve defining and solving
17 technology problems?

18 MR. GAGE: Objection.

19 A. For customers issues.

20 Q. Does the PM role involve private
21 whiteboarding sessions?

22 MR. GAGE: Objection.

23 A. You mean with customers?

24 Q. Yes.

25 A. Yes.

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2 Q. Does it involve any aspect of public
3 evangelism?

4 MR. GAGE: Objection.

5 A. Yes. I give keynotes. I talk. I
6 write blogs.

7 Q. Does the PM role involve doing deep
8 dives with internal engineering teams?

9 MR. GAGE: Objection.

10 A. Yes.

11 Q. Does the PM role involve meeting
12 across Google technical teams during an
13 engagement?

14 MR. GAGE: Objection.

15 A. Yes.

16 Q. Does the PM role identify -- involve
17 identifying design and development or deployment
18 friction points from a customer's perspective?

19 Does the PM role involve identifying
20 design, development, or deployment friction points
21 from the customer's perspective?

22 MR. GAGE: Objection.

23 A. Yes.

24 Q. Does the PM role involve working with
25 customers or partners to define joining

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2 initiatives?

3 MR. GAGE: Objection.

4 A. Yes.

5 Q. Does the PM role involve

6 corroborating across functional and product area

7 boundaries?

8 MR. GAGE: Objection.

9 A. Yes.

10 Q. Does the PM role involve working with

11 broader Google engineering and research teams?

12 MR. GAGE: Objection.

13 A. Yes.

14 Q. In what ways is the PM role similar

15 to the role that you were performing in OCTO?

16 A. Customer sponsorship evangelization,

17 working with other teams and so forth, but nothing

18 to do with the -- how we build a product, how we

19 define a strategy, how we execute that strategy.

20 Q. And so the next question is: How is

21 the PM role different from the role you were

22 performing in OCTO?

23 A. We are responsible for defining

24 long-term roadmaps, executing them incrementally

25 on quarterly, whatever short term, and the

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2 understanding where the trends are, market trends
3 are, and bringing it back to what our products and
4 platforms need to be doing.

5 And another responsibility, we have
6 to make sure that our revenue mark targets and so
7 forth are projected accordingly and we deliver on
8 our expected numbers.

9 Q. With respect to your role in PM, do
10 you understand that you're evaluated against a
11 leveling guideline?

12 A. Yes.

13 Q. And those engineering leveling
14 guidelines that we looked at before, are those
15 also relevant to the PM role?

16 A. Yes.

17 MS. GREENE: Okay, I'm just about
18 done. What I want to do is take a short
19 break and then we'll come back and finish up.

20 THE WITNESS: So what -- how long do
21 we need?

22 MS. GREENE: Let's take ten minutes.

23 MR. GAGE: Okay, we'll come back ten
24 minutes after the hour.

25 THE WITNESS: All right.

C E R T I F I C A T E

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

I, HOPE LYNN MENAKER, a Notary Public within
and for the State of New York, do hereby certify:

That EVREN ERYUREK, the witness whose
deposition is hereinbefore set forth, was duly
sworn by me and that such deposition is a true
record of the testimony given by the witness.

I further certify that I am not related to
any of the parties to this action by blood or
marriage, and that I am in no way interested in
the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 15th day of December, 2020.



HOPE LYNN MENAKER

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